

EXHIBIT 7

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11948-RGS

SEYED MOHSEN HOSSEINE-SEDEHY,)
Plaintiff)

vs.)

ERIN T. WITHINGTON and)
THE CITY OF BOSTON,)
Defendants)

DEPOSITION OF MOHSEN HOSSEINI, a
witness called on behalf of the Defendants,
pursuant to the Massachusetts Rules of Civil
Procedure, before Kelly G. Patterson, a
Notary Public in and for the Commonwealth of
Massachusetts, at the Law Department of City
Hall, Room 615, Boston, Massachusetts, on
Friday, October 14, 2005, commencing at
1:23 a.m.

1 A. I met her in an office. There was another
2 detective sitting there also taking notes.
3 Q. Do you remember who that other detective
4 was?
5 A. I was never informed of her name and she
6 never introduced herself.
7 Q. Was there anybody else at that meeting with
8 you?
9 A. No, just two ladies and myself.
10 Q. What happened when you first got there?
11 A. Very pleasantly, and the detective started
12 by saying "You know why you're here," or in
13 that effect, I do not remember the exact
14 words which were exchanged, and immediately
15 going back to Joe Perry. I made assumptions
16 and the conversation was started.
17 Q. What is it that you talked about?
18 A. Basically, all of the events of December of
19 2003. Why Mr. Perry, with a few other
20 Teamster's, did not like me.
21 Q. What did you say to Detective Schroeder
22 about Mr. Perry not liking you, as the
23 reason for that?
24 A. Mr. Perry is one, or used to be one, who

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1 would run away from tasks, would hide from
2 you all the time. When you would assign him
3 a task, he would look busy doing the task,
4 and then when you walk away, he would stand
5 around and talk to others. When he would
6 take breaks, he would take long breaks, long
7 lunches, to a point that one evening,
8 sometime in 2003, fall of 2003, I sent both
9 himself and his brother home one hour early
10 at 3:30, paid him until 4:30, and told him
11 this is for you two to go buy watches.
12 Mr. Perry was lazy and he looked for ways to
13 get out of work, so that was the basis of my
14 conversation with the detective why
15 Mr. Perry would have those accusations, I
16 believe.
17 Q. Did you explain what you just testified to
18 me to Detective Schroeder at the time?
19 A. In those words?
20 Q. Yes.
21 A. I do not remember, ma'am.
22 Q. Did she ask you any particular questions?
23 A. Yes, ma'am. She asked me multiple
24 questions. She asked me specifically if

1 there was a sexual harassment incident
2 between me and Mr. Perry and I said no. And
3 later on, through questioning, as you know,
4 we went through the same motions as we are
5 going through right now, informally. She
6 was taking the notes, there was no official
7 notetaker, and we started with my
8 background, just like today. I gave her
9 everything she needed to know about me, and
10 toward the end of the questioning, she just
11 ask if there ever was any incident that
12 there was any issue of any kind of sexual
13 harassment words spoken or in that format, I
14 don't recall exactly the words which were
15 spoken by her, which I did voluntarily tell
16 her about sometime in 2002 there was a
17 Teamster, Joe Bavis, when he was found out
18 of position, lost for two plus hours, and
19 started -- his way of doing things at the
20 time, or is or was, to be loud, the moment
21 something did not go his way to become
22 extremely loud, and distract what was going
23 on, so I told Detective Schroeder that I
24 grabbed Mr. Bavis and said "Joe, calm down."

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1 She asked me how I grabbed him. I said I
2 grabbed his shoulders. I shook him and said
3 "Joe, please calm down. Cool down. Let's
4 find out what's going on, we will deal with
5 it." This incident happened at the loading
6 dock of the Hynes Convention Center.
7 Usually, I have a supervisor run the dock
8 for me when I run the floor. When I went
9 down the elevators, I found Joe yelling.
10 That's how this whole thing started.
11 Q. When did this incident occur with Mr. Bavis
12 yelling?
13 A. Sometime in 2002, because after that show or
14 the show after that, Mr. Bavis went on
15 disability. He got hurt, he claimed. Then
16 he brought a letter -- we cannot, as a
17 company, as state and federal laws, put
18 anyone back to work without a release form
19 from a doctor. Well, the release form he
20 used to supply to us, which would go to my
21 superiors in the Loss Prevention and Safety
22 and everyone else, first, was handwritten,
23 which was not accepted, second, was typed
24 without any address of a doctor, which was

12 (Pages 42 to 45)